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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

John Shtino—Plaintiff

16 CV 9432 1

(In the space above enter the full name(s) of the plaintiff(s).)

COMPLAINT

-against-

Defendants: Mr. Donald J. Trump, President Elect of the United
States/ Donald J. Trump Campaign for President Inc./ Mr. Rudolph
Giuliani/ Mr. James K. Kallstrom

Jury Trial: ☐ Yes ☒ No
(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

FILED
U.S. DISTRICT COURT
2016 DEC -6 PM 3:55
S.D. OF N.Y.

I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name Mr. John Shtino
Street Address 83-05 98th Street—Suite 5N
County, City Queens County—Woodhaven
State & Zip Code New York State, 11421
Telephone Number 718-805-8083

- B. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name Mr. Donald J Trump, President Elect of the United States
Street Address Care of: The Trump Organization—725 Fifth Avenue—25th Flr.

County, City New York County, New York CityState & Zip Code New York State, 10022Telephone Number 1-212-832-2000Defendant No. 2 Name Donald J. Trump Campaign for President Inc. / Care of: Mr. Donald J. TrumpStreet Address The Trump Organization--725 Fifth Avenue--25th Flr.County, City New York County, New York CityState & Zip Code New York State, 10022Telephone Number 212-832-2000Defendant No. 3 Name Mr. Rudolph Giuliani/ Care of: Chairman and Chief Executive Officer, GiulianiStreet Address Partners LLC-- 1251 Ave. of the Americas--49th Flr.County, City New York County, New York CityState & Zip Code New York State, 10022Telephone Number 212-931-7300Defendant No. 4 Name Mr. James K. Kallstrom/ Care of: Chairman of the Board of the Marine Corp. LawStreet Address Enforcement Foundation-- 273 Columbus Avenue, Suite # 10County, City Westchester County-- TuckahoeState & Zip Code New York Sate, 10707Telephone Number 914-268-0630**II. Basis for Jurisdiction:**

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction? (*check all that apply*)☒ Federal Questions☒ Diversity of CitizenshipB. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? See attached

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship New York StateDefendant(s) state(s) of citizenship New York State for Mr. Donald J Trump and Mr. Rudolph Giuliani and Massachussetts for Mr. James K. Kallstrom**III. Statement of Claim:**

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events.

You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? The Plaintiff does not know where the alleged events occurred but believes they took place in New York State--and in Washington D.C.

B. What date and approximate time did the events giving rise to your claim(s) occur? The Plaintiff does not know the date the alleged events occurred but believes they took place in the last year of the Campaign

for the Presidency of the United States running till Election day.

C. Facts: See Attached

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. _____

See Attached.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation. See Attached

I declare under penalty of perjury that the foregoing is true and correct.

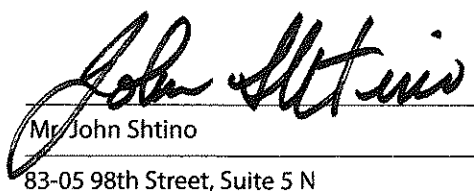
Signed this 6th day of December, 2016.

Signature of Plaintiff

Mailing Address

Telephone Number

Fax Number (if you have one)


Mr. John Shtino

83-05 98th Street, Suite 5 N

Woodhaven, New York, 11421

718-805-8083

646-395-1367

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this _____ day of _____, 20____, I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff: _____

Inmate Number _____

Attachment to Complaint begins at Roman Numeral II and is page 3 thru 45

II. Basis for Jurisdiction: What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question XX

☒ Diversity of citizenship XX

A. The Basis for Jurisdiction Is a Federal Question involving a Violation of the due process & Equal Protection provisions of The Constitution where a Citizen of The United State is entitled to a fair and free election free of illegal action involving Criminal facilitation and conspiracy by private citizens to utilize the power of Federal Employees and thereby the government to illegally influence a Federal Election and lead to abuse of power by Federal entities. Further—as a citizen of the State of New York and The United State—Plaintiff has standing to bring this case in this Court. Diversity exists in that the Plaintiff is a citizen of New York State and one of the defendants—Kallstrom-- is a citizen of the State of Massachusetts. Also, the amount in controversy will be substantially above \$ 75,000 as per relief sought herein.

III. **The Complaint:** This Complaint—which involves a request for an Emergency Hearing—is based on information and belief that Defendants Giuliani and Kallstrom—in one case—Giuliani—as advisor—and in both cases—as surrogates—and avid public supporters of Donald J. Trump for President—with the full knowledge as to goals and carte blanche on methods by Mr. Trump—conspired with certain FBI Agents—private individuals—and favored news organization to have information (leaks) illegally (Violation of the Hatch Act and Government Ethics leading to an abuse of federal power) furnished by Government employees with the express purpose of having Donald J. Trump elected President. That defendants facilitated criminal activity by members of the FBI in transmitting these leaks and further promoted their conducting partisan investigations— illegally leaking confidential government information—and using information created by these partisan investigation to justify the infamous and extremely damaging “Comey Letter,” and facilitated an illegally furnished avalanche of stories that dominated the news in the last eleven days of the election designed to cripple the Clinton bid for the Presidency. These criminal and fraudulent actions lead to a violation of plaintiff’s due process right to a free and fair election for the highest offices in the land—to include the Presidency—the House—and The Senate—and led to an election outcome that changed the election so that Trump won when he would have lost and certain

critical down ballot Senate seats were likewise effected thereby illegally manipulated the levers of power in the United States.

IV. Proofs of the Acts alleged:

1. The AP: • Former Mayor, Rudy Giuliani all but admitted receiving information from the FBI regarding the “Comey Letter.” As per the AP, he told Fox News’s Martha McCallum on Oct. 26 that Donald Trump had “a surprise or two that you’re going to hear about in the next two days.” “I’m talking about some pretty big surprise,” he said.

Two days later—on October 28th--FBI Director James Comey revealed to Congress that his agents had resumed their investigation of Hillary Clinton’s use of a private email server while she was secretary of state, after agents in an unrelated case discovered emails that could potentially be relevant to the server case.

Giuliani a former U.S. attorney and New York mayor whose former law firm represents the FBI Agents Association, subsequently claims that he has no inside sources at the bureau who might have given him a heads-up about what was to come and that his cryptic prediction of a surprise was about a Donald Trump advertising blitz in the final days of the campaign, and he had not talked to current FBI agents in the last eight to ten months. He says: “In that particular situation, I was actually talking about the advertising campaign that you were referencing earlier, that I knew was going to come as a big surprise,” Giuliani said of his comments to Martha MacCallum.

Plaintiff’s Comment: In an unguarded moment, in his original statement to MacCallum, Giuliani admitted receiving information thru his contacts with the FBI and—in fact—vis-à-vis the statement itself—was trafficking in this leaked information in furtherance of electing Donald J. Trump President. (This involving a Federal crime Hatch Act violation that Giuliani may have facilitated).

Back to the AP, Giuliani also subsequently addressed the question in an interview with “Fox & Friends” on the following Friday morning where he said he was “real careful not to talk to any on-duty, active FBI agents,” but he had “a lot of friends who are retired FBI

agents, close, personal friends.” He then opined about how his retired agent friends disagreed with Comey’s decision not to charge Clinton in the email case, and they felt the Justice Department was “obstructing” agents’ separate efforts to look into the Clinton Foundation.

Plaintiff Comment: Again, this “on second thought” clean up statement is not nearly as credible as what plaintiff views as the true unguarded statement and even mentions the subject matter of other unguarded statements made by both Giuliani and Kallstrom related to what they had heard from both retired and active agents.

2 • More Leaks and More FBI partisan Favoring of Donald Trump:

As per Wayne Barrett’s article in the November 3rd Daily Beast: “ Two days before FBI director James Comey rocked the world last week, Rudy Giuliani was on Fox, where he volunteered, un-prodded by any question: “I think he’s [Donald Trump] got a surprise or two that you’re going to hear about in the next few days. I mean, I’m talking about some pretty big surprises.” Pressed for specifics, he said: “We’ve got a couple of things up our sleeve that should turn this thing around.” The man who now leads “lock-her-up” chants at Trump rallies spent decades of his life as a federal prosecutor and then mayor working closely with the FBI, and especially its New York office. One of Giuliani’s security firms employed a former head of the New York FBI office, and other alumni of it. It was agents of that office, probing Anthony Weiner’s alleged sexting of a minor, who pressed Comey to authorize the review of possible Hillary Clinton-related emails on a Weiner device that led to the explosive letter the director, wrote Congress. Hours after Comey’s letter about the renewed probe was leaked on Friday, Giuliani went on a radio show and attributed the director’s surprise action to “the pressure of a group of FBI agents who don’t look at it politically.” He said: “The other rumor that I get is that there’s a kind of revolution going on inside the FBI about the original conclusion [not to charge Clinton] being completely

unjustified and almost a slap in the face to the FBI's integrity," said Giuliani. "I know that from former agents. I know that even from a few active agents."

Plaintiff's Comment: Incredible admissions by Giuliani--an officer of the Court--and a top surrogate--advisor--and campaigner for Donald J. Trump--that he received what the plaintiff views as almost certainly leaked information from both former and present agents--the present agents likely participating in partisan politics with the Trump campaign and its favored news outlets in violation of the Hatch Act involving an abuse of power.

Continuing with Barrett's article: "Along with Giuliani's other connections to New York FBI agents, his former law firm, then called Brace well Giuliani, has long been general counsel to the FBI Agents Association (FBIAA), which represents 13,000 former and current agents. The group, born in the New York FBI office in the early '80s, was headed until Monday by Rey Tariche, an agent who just retired from the New York FBI office. In Tariche's letter to the Association stepping down as president because he's retiring from the Bureau to take a job "within the Banking Industry," he wrote that "we find our work--our integrity questioned" because of it, adding "we will not be used for political gains."

"When the FBIAA threw its first G-Man Honors Gala in 2014 in Washington, Giuliani was the keynote speaker and was given a distinguished service award named after him. Giuliani left Brace well this January and joined Greenberg Traurig, the only other law firm listed as a sponsor of the FBIAA gala. He spoke again at the 2015 gala. The Brace well firm also acts as the association's Washington lobbyist and the FBIAA endorsed Republican Congressman Mike Rodgers, rather than Comey, for the FBI post in 2013. Giuliani did not return a Daily Beast message left with his assistant. Back in August, during a contentious CNN interview about Comey's July announcement clearing Hillary Clinton of criminal charges, Giuliani advertised his illicit FBI sources, who circumvented bureau guidelines to discuss a case with a public partisan. "The decision perplexes me. It perplexes Jim

Kallstrom, who worked for him. It perplexes numerous FBI agents who talk to me all the time. And it embarrasses some FBI agents.”

Plaintiff's Comment: Again, a blatant admission by a blatant partisan of receiving alleged illegally leaked communications on an active investigation from FBI agents and self evidently using same in furtherance of the Trump candidacy

Continuing with Barrett: “Kallstrom is the former head of the New York FBI office, installed in that post in the '90s by then-FBI director Louis Freeh, one of Giuliani's longtime friends. Kallstrom has, like Giuliani, been on an anti-Comey romp for months, most often on Fox, where he's called the Clintons “a crime family.” He has been invoking unnamed FBI agents who contact him to complain about Comey's exoneration of Clinton in one interview after another, positioning himself as an apolitical champion of FBI values. Last October, after President Obama told *60 Minutes* that the Clinton emails weren't a national security issue, Megyn Kelly interviewed Kallstrom on Fox. “You know a lot of the agents involved in this investigation,” she said. “How angry must they be tonight?” “I know some of the agents,” said Kallstrom. “I know some of the supervisors and I know the senior staff. And they're P.O.'d, I mean no question. This is like someone driving another nail in the coffin of the criminal justice system.” Kallstrom declared that “if it's pushed under the rug,” the agents “won't take that sitting down.” Kelly confirmed: “That's going to get leaked.” When Comey cleared Clinton this July, Kallstrom was on Fox again, declaring: “I've talked to about 15 different agents today—both on the job and off the job—who are basically worried about the reputation of the agency they love.” The number grew dramatically by Labor Day weekend when Comey released Clinton's FBI interview and other documents, and Kallstrom told Kelly he was talking to “50 different people in and out of the agency, retired agents,” all of whom he said were “basically disgusted” by Comey's latest release. By Sept. 28, Kallstrom said he'd been contacted by hundreds of people, including “a lot of retired agents and a few on the job,” declaring the agents “involved in this thing feel like they've been stabbed in the back.” So, he said, “I think we're going to see a lot more of the facts come out. Kallstrom, whose

exchanges with active agents about particular cases are as contrary to FBI policy as Giuliani's, formally and passionately endorsed Trump this week on Stuart Varney's Fox Business show, adding that Clinton is a "pathological liar." Kallstrom, who served as a Marine before becoming an agent, didn't mention that a charity he'd founded decades ago and that's now called the Marine Corps Law Enforcement Foundation was the single biggest beneficiary of Trump's promise to raise millions for veterans when he boycotted the Iowa primary debate. A foundation official said that Trump's million-dollar donation this May, atop \$100,000 that he'd given in March, were the biggest individual grants it had ever received. The Trump Foundation had contributed another \$230,000 in prior years and Trump won the organization's top honor at its annual Waldorf Astoria gala in 2015. The charity, which Kallstrom has chaired without pay since its founding, says it has given away \$64 million in scholarships and other aid to veteran families. Rush Limbaugh is a director and has given it enormous exposure on his show and helped it fundraise. Its executive director also worked at the highest levels of New York Governor George Pataki's Republican administration, and its vice president is also the regional vice president for Trump Hotels in the New York area. The FBI New York office, the charity's 2015 newsletter noted, then employed 100 former Marines. Kallstrom, who first worked with Giuliani when the future mayor was a young assistant prosecutor in the early '70s, was Pataki's public safety director for five years after the 9/11 attacks and claims he was the one who recommended Comey to Pataki, who got the Bush White House to name him to Giuliani's old job, U.S. attorney for the Southern District in 2001. Comey had worked in the Southern District for years, hired as a young assistant in 1987 by Freeh, then a top Giuliani deputy. Kallstrom's victory tour this weekend also included an appearance on Fox with former Westchester District Attorney Jeanine Pirro, another close associate of Pataki's, who complained on air that she'd been the victim in 2006 when word emerged that the U.S. attorney and FBI were probing her in the midst of a race she eventually lost to Andrew Cuomo to become New York Attorney General. Her concern about the political impact of law enforcement leaks, though, didn't extend to Democrat Hillary Clinton. "He couldn't hold on to this any longer," Kallstrom said of Comey. "Who knows, maybe the

locals would've done it," he added, a reference to leaks that elicited glee from Pirro, who echoed: "New York City, that's my thing!" In a wide-ranging phone interview on Tuesday with The Daily Beast, Kallstrom first repeated his claim that he gets hundreds and hundreds of calls and emails but stressed they all came from retired agents, adding that he didn't "want to talk about agents on the job." Then he acknowledged that he did interact with "active agents." The agents mostly contacted him before the recent Comey letter because "in all but two cases," they agreed with what he was saying in his TV appearances, noting that those two exceptions both thought "I should be more supportive of Comey." Kallstrom adamantly denied he'd ever said he was in contact with agents "involved" in the Clinton case, insisting that he didn't even know "the agents' names." He asked if this story was "a hit piece," and contended that it was "offensive" to even suggest that he'd communicated with those agents. When I emailed him two quotes where he made that claim, he responded: "I know agents in the building who used to work for me. I don't know any agents in the Washington field office involved directly in the investigation." Later, though he acknowledged that "the bulk" of the agents on the Weiner case are "in the New York office," even as he insisted that the "locals" he told Pirro would've leaked the renewed probe had not Comey revealed it were not necessarily agents. He declined to explain why Megyn Kelly stated as a fact that he was in contact with agents "involved" in the case. Asked in a follow up email if he suggested or encouraged any particular actions in his exchanges with active agents, Kallstrom replied: "No." "Now, I'm supporting Comey," Kallstrom told me on the phone, adding that he can't do or say anything else before Election Day. "He can't characterize" what the bureau has from the Weiner emails. "The FBI can't say anything without having all the information," Kallstrom contends, just after telling me he supports the FBI director who's under fire for having done just that. And, though he predicted in September that more facts about the Clinton case would soon come out, he told me he was "surprised" by the Comey letter. Calling Giuliani a "very good friend," who he's seen in TV studios a couple of times recently when they were both doing appearances, Kallstrom said he thought Giuliani was more likely referring to Wiki Leaks revelations or videotapes from Project VERITAS when

he teased big surprises to come. Kallstrom said he hasn't spoken to Trump for months, though he did email Trump's office the day he endorsed him and got a thank you response from an aide. He says he first met Trump when he solicited a donation from him for a Vietnam Vet memorial and that they'd see each other—usually at public events and dinners—over the years, sometimes as often as two or three times a year. Kallstrom said he'd have breakfast at the Plaza with his wife and visit with Trump and his kids, who he got to know at an early age. When Trump owned casinos in Atlantic City, he allowed Kallstrom's organization to hold fundraisers “pro bono” there. Trump became a major supporter of New York's Police Athletic League, run for decades by Manhattan District Attorney Robert Morgenthau, all moves that endeared him to law enforcement officials in jurisdictions where he did business. Despite his ties to Pataki, Limbaugh, and Trump, Kallstrom says he's apolitical and has never been involved in a campaign, including Trump's now. He says he's a registered independent, and that the people he's known in the FBI over all his years are as nonpartisan as he is. But, as quiet as it's kept, no Democrat has ever been appointed FBI director. Four Democratic presidents, starting with FDR's selection of J. Edgar Hoover in 1935, have instead picked Republicans, including Obama's 2013 nomination of Comey, who was confirmed 93 to 1. This tally does not include the seven acting directors, who were named for brief periods over the last 81 years. For the first time in FBI history, the agency is now run by a director who isn't a Republican, since Comey announced in a congressional hearing this year that though a lifelong Republican, having donated to John McCain and Mitt Romney, he had recently changed his registration (he did not say how he is currently registered). Six months into his first term in 1993, President Bill Clinton tapped Freeh, a onetime FBI agent who'd worked under Kallstrom, and Freeh spent much of his eight years at the bureau's helm trying to put Clinton in jail, even dispatching agents to a White House side room to get the president's DNA during a formal dinner. When Freeh stepped down in 2001, shortly after George Bush replaced Clinton, he went to work for credit-card company MBNA, a giant Republican donor where Kallstrom and another top Freeh FBI appointee were already working. He's still hunting for the Clintons,

though—delivering a speech assailing them at an annual FBI office event in New York last year. It's not just the man at the top who's invariably a Republican. Like most law enforcement agencies, the FBI hierarchy and line staff has a Republican bent—it's a white, male, usually Catholic, and conservative culture. Giuliani and Kallstrom claim that the agents revolting against Comey's handling of Hillary Clinton were doing it because they want apolitical investigations, with all targets treated the same. But neither of them, much less FBI brass or agents, were publicly upset when the worst Justice Department scandal in modern history exploded in 2007, with Karl Rove, Attorney General Alberto Gonzales, and the Bush White House swamped by allegations that they'd tried to force out nine U.S. attorneys and replace them with "loyal Bushies," as Gonzales's chief of staff put it. Democratic officials, candidates and fundraisers were five times as likely to be prosecuted by Bush's justice than Republicans. Then at the top of the polls in the 2008 presidential race, Giuliani had to answer questions about it and said that he thought Gonzales should get "the benefit of the doubt," calling him "a decent man" a few months before he resigned. "We should try to remove on both sides as much of the partisanship as possible," lectured Giuliani. He recalled that strict rules were put into place while he was at the top levels of justice in the aftermath of Watergate limiting contact between law enforcement and political figures, a particular irony in view of the fact that he talks freely today about engaging in just such conversations on national television, oblivious to the fact that he is now a "political figure." Giuliani's mentor, Michael Mukasey, who succeeded Gonzales as attorney general, appointed a special investigator to examine the U.S. attorney scandal and she concluded that no laws had been broken. It was later reported that four days before Mukasey named this special prosecutor, a federal appeals court vacated seven of eight convictions in a case she supervised in Connecticut, ruling that the team suppressed exculpatory evidence, including the notes of an FBI agent. Kallstrom contends he didn't say anything about the blatant partisan interference then because he was "never asked to comment," though he had been a law enforcement consultant for CBS News in about the same time frame. How he became a frequent Fox commentator now is unclear. It's clear enough, though, why when Comey sent a note to

FBI staff on Friday explaining his decision to inform Congress about the renewed Clinton probe, the scoop about that internal memo went to Fox News. Why Kallstrom gets booked to talk about the Clintons a “crime family.” Why *Clinton Cash* author Peter Schweitzer, caught in a web of Breitbart and Trump conflicts, would announce on Fox that he was asked in August to sit down with New York office FBI agents investigating the Clinton Foundation (with *The New York Times* reporting this week that the agents were relying largely on his discredited work when they pitched a full scale probe). Fox is the pipeline for the fifth column inside the bureau, a battalion that says it’s doing God’s work, chasing justice against those who are obstructing it, while, in fact, it’s doing GOP work, even on the eve of a presidential election.

Plaintiff’s Comments: The above seems to strongly substantiate FBI partisan leaks to the Trump Campaign and to favored news outlets—and as much substantiate the basis for this Complaint—the FBI’s collusion with Peter Sweitzer—who as described above is caught in a web of Breitbart and Trump conflicts—in furthering the Clinton Foundation investigation—and defendant Kallstrom’s almost certain involvement in the alleged conspiracy.

3. Bret Baier—Another Leak—“another story.”

Continuing with the pattern of partisan leaks clearly emanating from the FBI and just as clearly following a partisan path to a favored news outlet for partisan purposes, Fox News anchor Bret Baier—with a week to go to Election Day—reports sources advise that FBI investigators were moving toward a “likely indictment” in their investigation into the Clinton Foundation. Two days after this report, Bair retracts the statement and apologies for an in artful mistake.

Plaintiff’s comment: Another clear example of a highly damaging story based on sourced FBI information illegally leaked to a favored news outlet for partisan purposes.

4. More almost prima facia evidence of leaks and misdeeds:

Mayor Rudy Guiliani now denies that he was told by FBI agents that the bureau was reviewing newly discovered emails potentially related to Hillary Clinton’s use of a private

server before the review was publicly revealed. Earlier, he had suggested that he was told by FBI agents about the review before it became public. Giuliani, a top Donald Trump surrogate and adviser, told CNN's Wolf Blitzer on "The Situation Room" Friday that the FBI's announcement "came as a complete surprise, except to the extent that maybe it wasn't as much of a surprise. "I got it all from former FBI agents. Tremendous anger within the FBI about the way, number one, Jim Comey's conclusion (to not recommend criminal charges in July) and, number two, the way they believed they were being obstructed by what they regard as a pretty corrupt Obama Justice Department," Giuliani said. "Cutting off a grand jury investigation, cutting off subpoenas."

But earlier Friday, Giuliani, a former federal prosecutor, said he had "heard about" a forthcoming FBI announcement before it became public. "This has been boiling up in the FBI. I did nothing to get it out. I had no role in it. Did I hear about it? Darn right I heard about it," Giuliani said on "Fox and Friends." He continued, "I can't even repeat the language I heard from the former FBI agents."

A week earlier — before Comey's disclosure to Congress — he told Fox News there was a "pretty big surprise" coming, though he did not provide further details. He told Blitzer the surprise was an upcoming advertising campaign: "I knew that was going to come as a big surprise."

Giuliani insisted to Blitzer that he did not receive a tip from someone currently in the FBI.

"In my case, it's real simple: I've talked to no FBI agent, I've talked to no Justice Department official. I have no idea about who's leaking information."

The former mayor added that everyone he does talk to in the FBI is a former agent.

Blitzer reminded Giuliani that in an October 28 interview on "The Lars Larson Show," the former mayor said he was in contact with former agents "and a few active agents, who obviously don't want to identify themselves."

"Well, the information I've been getting is from former FBI agents," Giuliani told Blitzer. "If I did say that, that was wrong."

Plaintiff's Comments: Again—Giuliani's incredible out of control ego—leads to evidence of wrong doing in the FBI in concert with the Trump Campaign to illegally leak material to purposefully damage Clinton.

5. Still more proof:

Rudy Giuliani Confirms That He Knew the FBI Would Reopen Their Probe of Clinton-Related Emails

CHRIS ZOIS 11.04.16

It is a bit difficult to discern some of Rudy Giuliani's recent unhinged ramblings, but he definitely lays all his cards on the table. On Friday morning, the most enthusiastic Trump surrogate of all paid a visit to *Fox & Friends*. There, he admitted how he (and presumably, the rest of the Trump campaign) knew the FBI was going to investigate Clinton-linked emails again. Giuliani's declaration also comes on the heels of him hinting that it may have been him and some of his FBI allies that reignited this investigation, less than two weeks from the election. The probe began after the FBI discovered more Clinton-related emails while looking into disgraced congressman Anthony Weiner's sexting-with-a-minor investigation. Giuliani has not been shy in boasting about his connections to the FBI, and Friday indicates that there may be someone in the bureau leaking information to him. Adorned in his finest bow tie, Giuliani seemed to confirm those rumors, but he denied he actually pushed them to get the probe going again:

"I did nothing to get it out, I had no role in it," he said. "Did I hear about it? You're darn right I heard about it, and I can't even repeat the language that I heard from the former

FBI agents....I had expected this for the last, honestly, to tell you the truth, I thought it was going to be about three or four weeks ago, because way back in July this started, they kept getting stymied looking for subpoenas, looking for records."

It has been widely reported that the FBI was aware of these newly uncovered emails, which is why the timing of the announcement (so close to the election) riled some people up. On Thursday night, Giuliani also doubled down on his thoughts by telling Sean Hannity that President Obama should not pardon her for any crimes that she may be charged with. However, Giuliani may change his tune one day when Chris Christie may be seeking relief too.

6. Still More Arrogance and Incredible Self Incrimination. In Effect, the Conspirators Proudly Admit Their Guilt (Another on Target Article covering Blatant and Apparently Unapologetic Criminality).

Radicalized FBI Sleeper Cell Probably Led by Rudy Giuliani-- Leader of the coup?
By **Evan Hurst** -

November 4, 2016 - 1:00pm

This week, Fox News has trumpeted EXCLUSIVE INFO it's gotten from SECRET FBI SOURCES that said definitely, for real, five whole foreign intelligence agencies hacked into Hillary Clinton's private server, and for real, definitely, Hillary is about to be indicted, for "emails" and "Clinton Foundation," and sure thing, you bet! The breathless announcement of Hillary's impending indictment came from Fox's Bret Baier, who said the "investigation" into the Clinton Foundation is so much bigger than anybody knew, and you just wait! SQUEEEEEEE!

James Comey Strikes Again (And Again And Again And Again)

Of course, we've also been telling you there appears to be a group of rogue, Hillary-hatin' FBI agents, both in the New York office and elsewhere, who have been rootin' tootin' mad because their mean FBI and Justice Department bosses won't sanction their investigation into the Clinton Foundation, since it's based on debunked, Breitbart-funded bullshit from that dumb *Clinton*

Cash book. And all of this stuff has been leaking like crazy, less than a week before the election, because all the cool kids are violating the Hatch Act these days. (And they need to GO TO JAIL.)

Well, a funny thing happened! Normal networks like NBC, ABC and CNN all talked to their sources, who, without exception, said Bret Baier's thing was horseshit. Hillary Clinton's press secretary Brian Fallon even tweeted calling on the FBI to put out a statement clarifying that Bret Baier's thing was horseshit. Even Bret Baier, in his very Fox News way, "clarified" on Thursday that even though he was totally for sure that his sources were good and Hill is guilty, guilty, guilty, he had spoken "in artfully" when he said they were about to haul her off to Guantanamo or whatever.

But who ARE these sources? It's obviously coming from the He-Man Hillary Haters club in the New York FBI office, but who is whispering sweet nothings into Fox idiots' ears? Josh Marshall points out that in Baier's original report, he specifically said he got his intel from "two separate sources with intimate knowledge of what's going with these FBI investigations," and Marshall notes that the language Baier used means his sources are NOT ACTUALLY IN THE FBI. Who could they be? HMMMM!

The Daily Beast points us toward two men who are on Fox all the fucking time, who hate Hillary, and who have FBI ties: Rudy Giuliani and James Kallstrom. Giuliani, of course, is the former mayor of 9/11 and a top adviser to Donald Trump, and Kallstrom, also a rabid Trump supporter, used to run the FBI's New York office. Remember how Kallstrom said FBI Director James Comey was releasing all this because the "locals would have stepped in on this" and started leaking it? By "locals," he meant the New York office, the one that's gone rogue.

Tell us an interesting thing, Daily Beast:

TWO DAYS BEFORE FBI DIRECTOR JAMES COMEY ROCKED THE WORLD LAST WEEK, RUDY GIULIANI WAS ON FOX, WHERE HE VOLUNTEERED, UN-PRODDED BY ANY QUESTION: "I THINK HE'S [DONALD TRUMP] GOT A SURPRISE OR TWO

THAT YOU'RE GOING TO HEAR ABOUT IN THE NEXT FEW DAYS. I MEAN, I'M TALKING ABOUT SOME PRETTY BIG SURPRISES."

PRESSED FOR SPECIFICS, HE SAID: "WE'VE GOT A COUPLE OF THINGS UP OUR SLEEVE THAT SHOULD TURN THIS THING AROUND."

Huh! Were all these leaks up Giuliani's sleeve, near his gross armpit? MAYBE! The Beast notes Giuliani's *extensive* FBI ties, and quotes another thing Giuliani said on the radio, the day Comey sent his vague love note to Congress about new Hillary emails:

"THE OTHER RUMOR THAT I GET IS THAT THERE'S A KIND OF REVOLUTION GOING ON INSIDE THE FBI ABOUT THE ORIGINAL CONCLUSION [NOT TO CHARGE CLINTON] BEING COMPLETELY UNJUSTIFIED AND ALMOST A SLAP IN THE FACE TO THE FBI'S INTEGRITY," SAID GIULIANI. "I KNOW THAT FROM FORMER AGENTS. I KNOW THAT EVEN FROM A FEW ACTIVE AGENTS."

Rumors of a revolution! Rudy Giuliani's pals and buds are going to REVOLT, even though they are not actually the ones who make the decisions on investigations the FBI and Justice Department undertake. And that makes them MAD! Did their bosses not read *Clinton Cash*? Does Loretta Lynch even have a commenting account on Breitbart? So maybe they are just chit-chatting with their bro Giuliani about how GRRR HILLARY they are, and then Giuliani spits that knowledge into Fox anchors' mouths like a Mama Bird, and now the information is out there where it can hurt Hillary's electoral chances! Yay! Fuck if it's true or not, that can't possibly matter.

Then there is that Kallstrom guy, who is so close to Giuliani they probably are in a *mah jongg* group together. The Beast notes that when Director Comey made his original decision this summer not to recommend charges or

even the death penalty for Hillary's emails, Giuliani said the decision "perplexes" him, and "perplexes Jim Kallstrom" and it even was perplexing and even EMBARRASSING for their FBI contacts.

Also too, this shit:

BY SEPT. 28, KALLSTROM SAID HE'D BEEN CONTACTED BY HUNDREDS OF PEOPLE, INCLUDING "A LOT OF RETIRED AGENTS AND A FEW ON THE JOB," DECLARING THE AGENTS "INVOLVED IN THIS THING FEEL LIKE THEY'VE BEEN STABBED IN THE BACK." SO, HE SAID, "I THINK WE'RE GOING TO SEE A LOT MORE OF THE FACTS COME OUT IN THE COURSE OF THE NEXT FEW MONTHS. THAT'S MY PREDICTION."

Ooh, he's like Nostradamus, makin' prophecies that come true!

The Beast shares something else real funky, related to that time during the Republican primary when Donald Trump had a shit-fit over mean Megyn Kelly being allowed to moderate another debate. Trump boycotted that debate and instead did an event for a "veteran's charity" called the Marine Corps Law Enforcement Foundation. Trump gave them over a million ameros! Three guesses who runs that foundation, TIME'S UP IT IS JIM KALLSTROM!

So, are these two Trump fan girls the ones whispering the sexxy secrets to Fox? Maybe so!

Friday, on Fox's morning teevee show "Steve Doocy's Pajama Party," Giuliani said he "had no role" in these leaks, and added:

DID I HEAR ABOUT IT? YOU'RE DARN RIGHT I HEARD ABOUT IT, AND I CAN'T EVEN REPEAT THE LANGUAGE THAT I HEARD FROM THE FORMER FBI AGENTS.

Just guessing, but we bet they say the C-word about Hillary Clinton a lot, because they're so patriotic.

Kallstrom issued similarly toothless denials to The Daily Beast, and asked them if they were doing a "hit piece" on him.

So! We guess that settles that and Rudy Giuliani and Jim Kallstrom are innocent, angelic souls who would *never* act out of order on such issues and are *definitely* not the conduits for bullshit leaks about fake Hillary FBI "investigations." (OR ARE THEY?)

Regardless, all this fake news about Hillary Clinton is out there, and Donald Trump has told his paste-eating acolytes that Hillary's going to be indicted REAL SOON, and this could indeed actually sway the election!

In case you're wondering, the Trump campaign is pretty darn happy about all this. Trump "campaign manager" Kellyanne Conway shared her feelings Thursday night with Brian Williams on MSNBC:

"THIS HAS BEEN WALKED BACK, THE INDICTMENT PORTION, BY FOX NEWS WHO ORIGINALLY REPORTED IT AND BY NBC NEWS WHICH HAS DONE SUBSEQUENT REPORTING ON THIS," WILLIAMS SAID. "WILL DONALD TRUMP AMEND HIS STUMP SPEECH TO WALK BACK THE SAME THING?"

"WELL, THE DAMAGE IS DONE TO HILLARY CLINTON," CONWAY REPLIED. "NO MATTER HOW IT'S BEING TERMED THE VOTERS ARE HEARING IT FOR WHAT IT IS—A CULTURE OF CORRUPTION."

Haha, attempted coups are HILARIOUS.

Plaintiff's Comments: The Evidence that is out there justifies our request for an Emergency hearing and the reliefs which will be outlined herein.

7. Former Bush Justice Department officially memo to the Justice Department requesting an investigation into potential Hatch Act and Ethics violations:

● **The letter:**

Richard W. Painter
University of Minnesota Law School
229 19th Avenue South
Minneapolis MN 55455
(612)- 626-9707
October 29, 2016

To the Office of Special Counsel and the Office of Government
Ethics:

I write to request investigation of apparent violations of the Hatch Act by the Director and perhaps other officials in the Federal Bureau of Investigation (FBI) in connection with highly unusual public statements while voting is underway about the status of an investigation concerning a political candidate, former Secretary of State Hillary Clinton. I also request that the Office of Government Ethics ask the FBI to conduct an internal investigation of whether there has been misuse of official position, 5 CFR 2635.702. Violations of the Hatch Act and of this ethics rule are not permissible in any circumstances, including an executive branch official acting under pressure from persons such as the president and politically motivated members of Congress. Such violations are of even greater concern when the executive branch agency is the FBI. Some facts are public with respect to the FBI communication this week with certain members of Congress concerning the investigation of emails sent and received by Secretary Clinton and certain of her aides. Those facts will not be recited here, and I am not personally familiar with any nonpublic facts concerning this matter. I do not know whether the Director of the FBI personally wanted to influence the outcome of an election, although the content and wording of this week's letter is of concern. I am also concerned about the highly unusual public statements he made expressing his personal opinion about Secretary Clinton's actions, when he announced this past summer that the FBI was concluding its investigation of her email. But even absent a specific intent – or desire – of an official to influence an election, I believe that the Hatch Act and ethics rule are violated if it is obvious that the official's actions could influence the election, there is not another good reason for taking those actions, and the official is acting under pressure from persons who obviously do want to influence the election. To this last point, the fact that such other persons exerting pressure on the official, including members of Congress or the president or political operatives, are not subject to the Hatch Act or the OGE ethics rule, is irrelevant. The official still can violate the Hatch Act and the ethics rule in this situation. Absent extraordinary circumstances justifying it, a public communication about a pending FBI investigation involving a

candidate for public office that is made on the eve of an election or, as in this case, while voting is in progress, is very likely to be a violation of the Hatch Act. It is also a misuse of official position. The fact that politically motivated members of Congress want the communication to be made publicly only enhances the seriousness of the violation; it is not an excuse. This is clearly distinguishable from politically motivated policy decisions in particular matters, such as decisions to spend government money to create jobs in an election year. Such decisions, even if they influence elections, are not generally violations of the Hatch Act. Official actions specifically intended to communicate publicly a connection between policy decisions and a candidate – such as a Department of Transportation announcement of a major project in a Congressman's district on the eve of an election, at a ceremony attended by the Congressman and Department officials – would be highly problematic and border on violations of the Act depending upon proximity to the election. Decisions about particular party matters including investigations and litigation, in which candidates are the particular parties, are even more problematic. These particular party matters must be handled with considerable care in order not to violate the Hatch Act or the ethics rule. That clearly was not done here. Director Comey's actions in communicating about the investigation the way he did, appear to put him and others at the FBI in a position of violating the Hatch Act. Various members of Congress may be complicit in these actions, but the actions are still those of officials at the FBI. Unless remedial action is taken, there is likely to be a continuing violation of the Hatch Act up through Tuesday November 8. The same is true with respect to the OGE ethics rule prohibiting misuse of official position. The misuse of position might be at the behest of or because of pressure exerted by members of Congress who are using their office for partisan political gain, but it is still a misuse of position at the FBI. This is no trivial matter -- the Department of Justice reports to the President. Both the Attorney General and the FBI Director are appointed by the President. They also report to Congress in its oversight function. We cannot allow these officials, absent a compelling reason, to publicize pending investigations concerning candidates of either party while an election is underway. That is an abuse of power. Although there is no evidence of abuse of presidential power here, this precedent will invite such abuse in the future. Your offices should take appropriate action without delay.

Very truly yours,

/s/

Richard W. Painter

Plaintiff's Comments: Strong case for a Justice Department Investigation for sure.

8. Fox News' Judge Napolitano Blasts James Comey: FBI Had No Duty Or Right To Violate Due Process

By John Amato

John Amato

Fox News' Judge Napolitano tore into FBI Director James Comey for injecting the FBI into the political process, informing Congress about Anthony Wiener's laptop, linking it to Hillary Clinton without any proof and violating his oath of office and due process.

Judge told Fox News' Shep Smith, "There was absolutely no duty, obligation, or right for him to announce that the Clinton investigation had been opened."

He explained, "Look, if they found treasure trove information on Anthony Weiner's laptop, they are duty bound to investigate what they found. But, the law prohibits the FBI from taking a snapshot, a progress report of a criminal investigation, and broadcasting that. It is sort of like, "hey, we have some stuff on you. We don't know what it is. We haven't looked at it yet, we haven't decided the significance of it, we don't even know if it's about you or somebody that works for you, but we're just telling everybody that we have it." That violates due process, the essence of which is, notice what's going on, and fairness, and I'm very disappointed, as are a lot of people from all over the political spectrum."

There has been considerable outrage not just from Democrats or Clinton supporters, but from many Republican pundits as well.

"James Comey broke protocols that have been put in place so law enforcement can't influence elections. 'J. Edgar Comey' had no right to disrupt the election. **And even if he had proof, the FBI has no obligation to be transparent.** They investigate in private and then pass their findings to the Justice Department, period. "

Smith asked the judge what would have happened if Comey didn't make the announcement and partisans began to attack him for a cover up.

Napolitano said, "**But the FBI doesn't work for the Congress and the FBI's not supposed to be transparent.** It's also not supposed to make legal judgments about whether or not a prosecutor will take a case."

Hear that Bret Baier, Fox News, WSJ?

He continued, "It gathers facts in secret, it presents those facts in secret...The Justice Department decides..."

"For him to make public announcements on his own is where he injected the FBI in the political process, ten days before the election, which was the reason for the comparison to Hoover, who never had problems doing that."

When Comey held a press conference in July it also signified that the FBI was entering the political process because Comey was not supposed to give a summary of his findings, but pass them on to his bosses.

Napolitano said, "This statement shouldn't have been made with the implication that it's about [Hillary Clinton]. Because, when he sent the letter to Congress, in fact, he had not seen those emails. We know that because he sent the letter on Friday, and a search warrant authorizing review of the emails wasn't signed until Sunday night.

[...] We all have great sources. We are all hearing the same thing, and I'm convinced that Director Comey jumped the gun. Look, if I'm wrong, if there's some bombshell in there, again, his duty is not to go to the Congress and not to go to the press, but go to his bosses in the Justice Department."

Napolitano is validating Fareed Zakaria's claims, who likened Comey's actions to a banana republic.

Judge Napolitano backed up his criticism of Comey by publishing an article today called, "FBI Director James Comey has behaved like J. Edgar Hoover":

One of the most dangerous tendencies of big government is the generation of a police state -- wherein laws, rules and procedures are primarily written and can often be bent to aid law enforcement when it is encroaching on our personal freedoms. We saw a terrifying example of that last week when FBI Director James Comey behaved as if he were his most infamous predecessor, J. Edgar Hoover.

The genesis of all this was Comey's unprecedented news conference on July 5, at which he announced that no charges would be filed against Clinton because no prosecutor would take the case. That was not an announcement for him to make.

The FBI's job is to gather facts and present them to the DOJ, not to make legal evaluations.

The judge is no Clinton fan and did want to see a prosecution, but what he is not is a fanboy of the actions the FBI took during the entire investigation of Hillary's email server.

Comey has undermined our political process which may have massive ramifications come November 8.

9. Judge Napolitano: FBI Director James Comey has behaved like J. Edgar Hoover



By Judge Andrew P. Napolitano
Published November 03, 2016

FoxNews.com

Jim Monej

I had intended to use this final column before the presidential election to explain at length why I cannot vote for either Hillary Clinton or Donald Trump and plan to vote for Gary Johnson for president. In a nutshell, big government is our biggest problem. It thrives on more debt, more taxes, more regulations, more war, a secretive deep state and less personal freedom. Both Clinton and Trump would grow the government. Only Johnson would shrink it.

One of the most dangerous tendencies of big government is the generation of a police state -- wherein laws, rules and procedures are primarily written and can often be bent to aid law enforcement when it is encroaching on our personal freedoms. We saw a terrifying example of that last week when FBI Director James Comey behaved as if he were his most infamous predecessor, J. Edgar Hoover.

Here is the back story.

Late last week, in an effort to redeem himself from the consequences of having ignored a mountain of evidence of guilt against former Secretary of State Hillary Clinton last summer, Comey told Congress in a cryptic letter that the FBI would resume investigating her emails based upon the belief that more of them may be located in the laptop of disgraced former Rep. Anthony Weiner. Weiner is the alleged sexual predator who remains the estranged husband of Huma Abedin, one of Clinton's closest aides. Abedin backed up all her emails onto the laptop that she and her husband shared.

At the time he sent his Friday letter, Comey had not yet seen the contents of the Weiner laptop because the search warrant authorizing FBI agents to access its contents was not signed until Sunday. If he saw something incriminating before he wrote his letter, he saw it unlawfully; yet his duty was to bring what he saw to the Department of Justice, for which he works, not to hint about it publicly to Congress.

Comey's progress report to Congress is prohibited by the internal regulations of the DOJ and the FBI -- and by the canons of legal ethics that regulate lawyers. Comey had no obligation to send the letter at any time; moreover, sending it last week was a direct violation of DOJ and FBI rules that prohibit all public announcements about candidates for public office within 60 days of Election Day.

Comey told FBI staffers early this week that he sent the letter because he felt duty-bound to members of a congressional committee to whom he had given a promise that he would keep them informed of the status of the email investigation. That was a troublesome promise because its compliance violated other duties imposed upon Comey. Worse than making a promise and not keeping it is making a promise that should not be kept.

The genesis of all this was Comey's unprecedented news conference on July 5, at which he announced that no charges would be filed against Clinton because no prosecutor would take the case. That was not an announcement for him to make. The FBI's job is to gather facts and present them to the DOJ, not to make legal evaluations. He made his announcement when he did to head off the behavior of some of his agents who were seeking Clinton's medical records, unlawfully, from the National Security Agency to ascertain the gravity of her head injury -- an injury she posited during her FBI interrogation as the reason for her professed memory loss.

I have argued that Comey's July 5 decision was dead wrong; there is a mountain of evidence with which to indict and convict Clinton on espionage charges. Yet it should have been presented to a grand jury -- it was not -- rather than at a news conference. The July 5 announcement was bizarre in that it not only exonerated Clinton but also described the quantity and quality of the evidence against her. This insulted the agents who worked on the case and produced the lowest collective FBI morale since Watergate. If Comey sent his Friday letter to address the problems he caused by his July 5 announcement, he did the wrong thing for the wrong reasons.

But perhaps the gravest of Comey's violations is that of the constitutional guarantee of due process. The essence of due process is notice and fairness. How exquisitely unfair of Comey to say, in effect, "We have something that warrants investigation of you, yet we don't know its significance, so we can't say what it is." This is reminiscent of Franz Kafka's "The Trial," in which the lead character is being pursued for a year on unnamed charges, against which he cannot defend himself.

In his play "A Man for All Seasons," Robert Bolt shows Sir Thomas More arguing with William Roper, a colleague, who suggests that government lawbreaking can be justified for the greater good, particularly if the target is the devil (which Trump has called Clinton). More demolishes that argument in a few now iconic lines: "And when the last law was down, and the Devil turned round on you -- where would you hide, Roper, the laws all being flat? This country's planted thick with laws from coast to coast -- man's laws, not God's -- and if you cut them down, and you're just the man to do it, d'you really think you could stand upright in the winds that would blow then? Yes, I'd give the Devil benefit of law, for my own safety's sake."

To my friends who have rejoiced in James Comey's letter, please take warning that, as More accurately predicted, the tables can be turned. If there is any moral lesson in all this, it is that the history of human freedom consists of paying careful

attention to constitutional guarantees and legal protections, no matter the reputation of the accused.

10. Fareed Zakaria Likens Comey's Actions To Banana Republic

By Nicole Belle

I come from a family with immigrants from Ireland, Iran, Canada, Egypt, Germany, Poland and England in just the last two generations (and even more beyond that) and I married a Danish immigrant. So I regularly communicate with family and friends from all over the world. And almost to a one, their questions circle back to "What the hell has happened to your country?"

Don't get me wrong, it's not an entirely *new* question. I was visiting a writer friend for whom I did some editing in the Netherlands right after the Iraq invasion and occupation and she introduced me to her friends and colleagues as the "good kind" of American, meaning I wasn't a Bushie. We went to France in 2010 to see my brother-in-law and the landlord of our rental flat congratulated us on having had the wisdom to elect Barack Obama, whom he assured us was very, very popular in Europe.

But then this election season happened.

And left and right, we see the norms by which we have held this democracy, by which we have operating being violated, with little to no recourse. James Fallows:

The rules in politics haven't changed that much in recent years. What has changed is adherence to norms, in an increasingly destructive way.

I made that case, using examples different from the ones I'm about to present here, nearly two years ago. The shift in norms is also a central part of Thomas Mann's and Norman Ornstein's prescient *It's Even Worse Than It Looks* and Mike Lofgren's *The Party Is Over*, plus of course Jonathan Rauch's "How American Politics Went Insane," our very widely read cover story (subscribe!) this summer.

The norms—that is, the expectation of what you “should” do, what you “really have to do,” what is the “right thing” to do, even if the letter of the law doesn't spell it out—have changed. For its survival, a democracy depends on norms. That's why the shift matters.

And that is the context in which I think about James Comey's plunge into electoral politics, with his announcement about whatever “new” Clinton-related email information the FBI may or may not have found.

So when Fareed Zakaria warns that this move by Comey has all the hallmarks of a banana republic in some third world country, that's not something to dismiss easily. There are far-reaching ramifications that go long past the easy partisan shot being taken here. Imagine how much harder it will be for the US to condemn other countries for election shenanigans. How far has our standing dropped in the eyes of the rest of the world?

I wonder if the Republicans goading Comey into this unprecedented action gave one bit of consideration to that.

Plaintiff's Comments: I conclude that Comey's actions were a blatant abuse of power and the circumstances surrounding these actions strongly confirm that the allegations in this complaint should be fully investigated.

IV. The Damages Caused which affect the plaintiff:

1. The damage related to a fair and free democracy and one of its most important aspects: Free and Fair elections and the consequent violation of the plaintiff's constitutional due process and equal protection rights to a fair and free election.
2. The extreme damage done to a critical agency of the government of The United States: The Federal Bureau of Investigation and the consequent damage to the plaintiff as a citizen of the United States.
3. The initial actions of the Trump transition team are a nightmare for progressive's: Myron Ebell—"a climate Skeptic" to head up the EPA (an envoi mental disaster); Jeff Session—"anti voting rights alleged racist"—for Attorney General (" Justice for Some") ; Former General Michael Flynn—"alleged far right winger" as National Security Advisor; a rumored important cabinet position for the subject of this complaint--Rudy Giuliani— Steve Bannon—"what can one say"—as Special Advisor to the President. And they have just begun .As a Good Government Progressive—the illegal election of Donald J. Trump will cause great damage to the plaintiff as it will cause immense damage to the United States.
4. The extreme damage which a totally unqualified candidate who has been illegally elected is inflicting on the American public and the world as a whole regarding his total disregard for ethics and conflicts of interest in government—good relations with Foreign governments and intelligent diplomacy—a respect for the Constitution and the rule of law—knowledge of a fair free enterprise system and historical evidence of the extreme negative long term effects of "pay off crony capitalism—and so many other areas. Were this the result of a fair free election free of criminality and abuse of power the opponents to the "Trompian regime" would have to swallow the will of the people but this is not the case in this horribly flawed and rigged FBI--Giuliani--Kallstrom--Trump--unknown multiple favored news outlets—certain government employees—and who knows who else to be found in a full investigation—election.
5. The unlawful election results which allow for a balance of power where President Trump can almost certainly select a Supreme Court Justice with right leaning views—a "nightmare for progressives."

6. I am a Moslem and as such for reasons of persecution of religious liberties have “A special stake in insuring that Mr. Trump is not allowed to assume office thru illegal means.” Less the Court be misled here—like many Albanians—I am white with a European surname-- and not practicing or religious or easily identifiable as a Moslem, and therefore do not face the problems that religious easily identifiable Moslems do—but as a Moslem who may wake up tomorrow having found my religion so to speak with every right to do so and with every right to practice my religion without interference or intolerance from the State—and as one who has great sympathy for fellow Moslems who face religious intolerance—persecution—and violence—who believes that Trump is a bigot of the highest order—I would urge the Court to grant me standing to protect my religious liberty and hear this case.

7. The clear effect on the election for Presidency—The Senate—and The House with certain effects almost assuredly affecting the out come of the election allowing a candidate who was to lose to win and a candidate who was to win to lose.

A. The effect on the total election process is self evident and need not be dealt with. There is no question but that Hillary Clinton and down ticket Democrats were adversely affected. The proof of this effect on certain elections where the resultant winner benefitted from the poison fruit of the claimed criminal and fraudulent actions and the loser severely damaged by same follows:

• **Abstract from Huffington Post article on Comey’s effect on the election:**
The Impact of Comey’s Unconstitutional Intervention in the Election

William E. Jackson Jr. Columnist, foreign policy expert, former U.S. Senate staffer and State Department/ACDA official

CONTEXT and CIRCUMSTANCE

With eleven days to go before Election Day, the director of the Federal Bureau of Investigation, James Comey—apparently responsible to no one else in the government—made an unprecedented decision to insert the bureau into the 2016 presidential campaign while early voting was underway. For nine days—October 28-November 6—the citizens of this country had virtually nothing to go on but reports attributed to anonymous law enforcement officials.

In an ambiguous letter, sent to some Congressional committee chairmen and ranking members on October 28, Comey stated that the bureau had not yet determined *whether or not this material may be significant*, implying that a new development upsetting the

presidential campaign might ultimately have no impact on the concluded (as of July 5) investigation into former Secretary of State Hillary Clinton's classified email. And, indeed, it did not.

Comey had not even read the referenced, separate Anthony Weiner file, in order to determine what might be pertinent or significant to the Clinton case! But he told FBI employees on that same Friday, October 28, that he had felt obligated to send notice to Congress out of an "abundance of caution." One might add an abundance of hubris.

His vague pronouncements were to dominate the news cycle for the next nine days, sparking renewal of the earlier narrative that Clinton was under federal investigation. It is indisputable that millions of voters went to the polls under a false impression that there was new evidence against Clinton, showing possible criminality.

In the course of those nine days, Clinton's widely-reported substantial lead in the polls over Donald Trump was checked. Comey had put his thumb on the scales!

While he disappointed conservatives when announcing on July 5 that the FBI would not recommend charges is brought against Clinton, Comey had taken the unusual step of publicly condemning her behavior as *extremely careless*.

Much of the criticism of Comey's October 28 intervention broke along partisan lines, with almost 100 former federal prosecutors and Justice Department officials of both parties signing an open letter about Comey's decision to release information about a new inquiry just days before the election:

Many of us have worked with Director Comey; all of us respect him. ***But his unprecedented decision to publicly comment on evidence in what may be an ongoing inquiry just eleven days before a presidential election leaves us both astonished and perplexed.

II. FIRST CONSEQUENCE

The political damage had been done, as surely Comey could have anticipated. There was no way to clear up the matter, expeditiously. The bell could not be un rung.

Had any high official in the Justice Department seriously contemplated that Clinton would then be indicted—by a Justice Department prosecutor—since Comey had had no national security grounds to hang it on back in the summer? But a cloud had been floated.

And the stage was set for the specter of a severely divided government after the election—under which there would be no confirmation of a new, ninth member of the Supreme Court.

By *not performing due diligence*, without at least having taken a peek at the contents of the Weiner file—discovering a blockbuster national security issue directly tied to the former Secretary of State?—Comey went rogue without the approval of Attorney General Loretta Lynch.

III. ULTIMATE CONSEQUENCE

It is not my purpose to challenge the electoral vote count that has made Donald Trump the President-elect, although the definitive count is relevant to my main argument.

The extra-constitutional intrusion of FBI director Comey into the presidential election—eleven days before Election Day (only to reverse himself on November 6)—spread the false impression that the investigation into her emails had been re-opened.

The negative news undoubtedly shaved 1-2 points off her eventual totals in several “swinging swing” states where the presidential race proved to be very close—especially in three of those states in the *red corridor* (or wall) running from Pennsylvania to Ohio to Michigan to Wisconsin—and in which vote spreads were to be measured in decimal

points. According to The Washington Post, almost two-thirds of Americans (63 percent) said that Clinton's *use of private email* had bothered them. Among that group, Trump won 70 percent to 24 percent. Comparable polling figures for individual states are not yet available.

IV. Decimal Points and Votes: WHAT MIGHT HAVE BEEN

In turn, the tighter presidential race adversely impacted close Senate races in Pennsylvania and Wisconsin; and also New Hampshire—with a combined total of 34 electoral votes. In the latter, Clinton finished with a lead of +.3 and the Democratic Senate candidate (Gov. Hassan) with a lead of +.1 over Republican Sen. Ayotte.

The loss of 2 Senate seats by Democrats running against Republican incumbents (Sen. Toomey over Katie McGinty in Pennsylvania, and Sen. Johnson over former Sen. Russ Feingold in Wisconsin) probably cost Democrats 50-50 divided control of the Senate. That outcome would have enhanced their leverage in choosing a new Supreme Court Justice.

..... By comparison, Clinton lost in Pennsylvania by 68,236 or 1.2%; in Wisconsin by 27,257 or 1.0%—and, in Michigan, by 11,837 or 0.3%.]

Of incidental note: As reported by David Leonhardt of the New York Times in a November 11 online newsletter:

Hillary Clinton didn't just win the popular vote. She won it by a substantial margin. By the time all the ballots are counted, she seems likely to be ahead by more than 2 million votes and more than 1.5 percentage points, according to Nate Cohn. She will have won by a wider percentage margin than not only Al Gore in 2000 but also Richard Nixon in 1968 and John F. Kennedy in 1960.

V. CONCLUSION

The current electoral vote projection is Trump=305; Clinton=233. If Clinton had won Pennsylvania and Michigan—totaling 36 electoral votes—she could have tied Trump in electoral votes: 269-269. If she had won Wisconsin, as well, she would have been elected President by nine electoral votes: 279-259.

The current projection of party division in the Senate is: 52 (R)-48 (D).

In thinking about the latest FBI review that cleared Clinton in the email inquiry two days before the election, consider how many million ballots were cast with the October 28 proclamation of the director prominent in their minds. How many voted early, or mailed in their vote, assuming that a smoking gun was hidden in the thousands of emails on Anthony Weiner's computer?

Moreover, how many races, down ballot, were seriously impacted by the reckless statement and the imagined implications of the words uttered by the director of the F.B.I. on October 28?

These questions still hang over this election. While their answers are ultimately, definitively, unknowable, the consequences of one wrong speculation, now shown to be wholly unfounded, are undeniable.

Under the separation of powers, three institutions have been impacted by the FBI *sting* operation: the Senate, an evenly divided Supreme Court, and the Presidency. High stakes!!! The *Comey Coup* was a coup against the Constitution.

END

• How Did Independents Break in the end:

Tracking Poll: Trump behind 1 percent, Clinton hurt by FBI bombshell

By DANIEL CHAITIN (@DANIELCHAITIN7) • 10/30/16 7:28 AM

The gap[between Donald Trump and Democratic rival Hillary Clinton has shrunk to 1 percent, according to the latest results of a daily ABC News/Washington Post tracking poll released Sunday.

Over the last five days, Clinton's 12-point advantage among likely voters (50 percent to 38 percent) has been whittled down to a 46 percent-to-45 percent lead over Trump in a four-way race .Notably, Trump saw his support among independents grow over the last 24 hours. Their support swayed from being in Clinton's favor by 6 percent last week to giving Trump a 16-point advantage Saturday, to 19 percent on Sunday. Clinton's dominate campaign prospects took a hit this week after it was announced Obama care premiums are expected to rise and and the release of more Wiki Leaks emails, including "hustling" going on at the Clinton Foundation. The FBI capped off Clinton's rough week on Friday when Director James Comey told lawmakers his agency had found documents related to an investigation into her emails from an unauthorized server used while serving as secretary of state.

•As per plaintiff--Independents: In an early October poll, Clinton led Trump among independents (28 % of the electorate) 45% for Clinton to 40 % for Trump. Subsequently in an early November poll Clinton led @ 30 % to —27 % for Trump—with the balance to others, unsure—and undecided. The CBS exit poll conducted by Stanly Feldman and Melissa Herman published in Nov 9, 2016, showed this group voting : 49 % for Trump—41 % Clinton among women voters and 57 % Trump—31 % for men.

Plaintiff's Comment: Clearly, something happen toward the end of the election which strongly affected the critical independent vote—and that something is “The Comey letter and cavalcade of leaks effect.” If we take a conservative 3.3 % loss for Clinton due to these effects, and use 28 % for the Independents share of the electorate, (.28 % x 122 million=34.16 million x 3.3 % =1,137,000) we show Clinton gaining 1,137,000 votes absent the effect and Trump losing that amount.

• **College Educated White Women:**

As per plaintiff: Polls throughout, to include in early November, showed Clinton leading Trump with this group by 54 to 38 % or a full 16 %. When the day of reckoning came, via the CBS exit poll—this group voted 51 % for Clinton—46 % for Trump—a difference of only six percent or a 10 % loss for Clinton. If we reasonably allocate 3/1/3 % of that ten percentage points loss to the “Camey & Cavalcade of leaks effect, a thumbnail sketch shows Clinton gaining (20% share of electorate at 122 million or 24.5 million for College educated women) (3.33 % x 24.5 million = 815,000) 815,000 votes and Trump losing the same.

• **The Undecided Late Breakers:**

As per plaintiff: This group broke overwhelmingly for Trump. In our view this occurred because of The Comey Letter and cavalcade of leaks “effect. When applying a conservative 2 % adjustment related to this effect (utilizing 10 % in the last weeks of the campaign for this group) we show a gain of (.02x 12.2 million = 240,000 votes) 240,000 votes for Clinton and a commiserate loss for Trump.

• **The Millennia’s and how they voted:**

As per plaintiff: This group overwhelming voted for Clinton at 55 to 37 %. This vote was however 5% less than Obama’s performance with Trump doing as well as Romney. Now a good deal of this can be explained by simply recognizing that Clinton is not the inspiring campaigner young people love but rather more the “work horse” and just as importantly not as progressive as this group would wish. What is critical as regards this group is that 8% of the group’s approximate 23 million votes went to what were substantially not inspiring or intellectually stimulating third party candidates and that the overwhelming majority of this more socially liberal voters would have cast their vote for Clinton. The answer to the question how many of these voters in the end decided to vote for Clinton but were then dissuaded by “Comey’s Bombshell” which is difficult to Devine for sure but what can make a very good guess at is a substantial number. In my view a conservative good guess would be a 2 % of the total with 70 % of that amount going to Clinton for a (350,000 versus 150,000) 200,000 plus gain for Clinton.

•Other: As per plaintiff: There are a multitude of other factors which can be cited here such as the reduced turnout—the disillusionment with the candidates and the campaign themselves and the overwhelming overriding concern of the electorate of the honesty and trust worthiness of both candidates with Clinton in the end to be found more untrustworthy and less honest. The “Comey letter and the avalanche of accompanying leaks” would have an effect in a normal election year but in a year with the question of honesty and trustworthiness being very much front and center, in this election year “The Comey Letter and Avalanche of leaks no doubt had a significant effect and a detailed analysis of the vote will show that.

Conclusion: For all the reasons stated regarding “The Comey Letter and leaks” plaintiff believes a proposed 2 % adjustment is very reasonable in an elections where that change would be the difference between victory or defeat—and there fore affect power. The elections where the most damage occurred in terms of the Plaintiff’s preference for allocation of power are therefore cited below as those for which relief will be requested.

• The Presidency and the Swing States:

1. Michigan with 16 Electoral Votes:

Result: Trump: 48 % Clinton: 47 % (difference 13,000 votes)

2 % Comey/avalanche of leak adjustment result.

Trump: 46 % Clinton: 48 %

The actual adjustment required to change this result is .5 %. This leads to an increase of 16 votes to Clinton and minus 16 for Trump.

2. Pennsylvania with 20 Electoral Votes:

Result: Trump: 49.1% Clinton: 48 % (Difference 64,678 votes)

2% Comey/avalanche of leak adjustment result.

Trump: 47.1% Clinton: 50 %

The actual adjustment required to change this result is .6%. This leads to an increase of 20 electoral votes to Clinton and minus 20 for Trump.

3. Wisconsin with 10 electoral votes:

Result: Trump: 48 % Clinton: 47.1 % (Difference 27,000)

2% Comey/avalanche of leak adjustment result.

Trump: 46 % Clinton: 49.1 %

The actual adjustment required to change this result is .6%. This leads to an increase of ten votes for Clinton and less 10 votes for Trump.

4. Florida with its 29 Electoral Votes

Result: Trump: 49.2 % Clinton: 48.0 % (Difference 119.1870)

2% Comey/avalanche of leak adjustment result.

Trump: 47.2 % Clinton: 50.0 %

The actual adjustment required to change this result is .7%. This leads to
an increase of 29 votes for Clinton and 29 less for Trump.

5. North Carolina with 15 electoral votes:

Result: Trump: 50.5 % Clinton: 46.7.0 % (Difference 177.529)

2% Comey/avalanche of leak adjustment result.

Trump: 48.5 % Clinton: 48.7 %

Utilizing the entire adjustment of 2 % leads to an increase of 15 votes for
Clinton and a reduction of 15 for Trump.

Final tally adjusted for 2% Comey/avalanche of leak.

Result: Trump: 290 Clinton: 232

2% Comey/avalanche of leak adjustment result.

Result: Trump: 200 Clinton: 322

As is clear from the above, the Comey/avalanche of leak adjustment result leads to a victory for Clinton and justifies a call for a new election in the effected States with the margins in all cases but one required to change the election results being significantly less than what the plaintiff reasonably posits as the Comey/avalanche of leak effect.

Senate races to be reviewed:

1.The state of Pennsylvania result:

Result: Tomey: 48.9 Mc Ginty: 47.2 %

2% Comey/avalanche of leak adjustment result.

Result: Tomey: 46.9 Mc Ginty: 49.2 %

The actual adjustment required to change this result is .8%. This leads to an adjustment that would make Mc Ginty the Senator elect from the State of Pennsylvania.

2. The State of Missouri Result:

Result: Blunt: 49.4 % Kander: 46.2 %

2% Comey/avalanche of leak adjustment result.

Result: Blunt: 47.4 % Kander: 48.2 %

The actual adjustment required to change this result is 1.7%. This leads to an adjustment that would make Kander the Senator elect from the State of Missouri.

3. The State of Wisconsin Result:

Result: Johnson: 50.2 % Feingold: 46.8%

2% Comey/avalanche of leak adjustment result.

Johnson: 48.2 % Feingold: 48.8 %

The actual adjustment required to change this result is 1.8%. This leads to an adjustment that would make Feingold the Senator elect from the State of Wisconsin.

As can be seen from the above, the review calls for new elections in the States of Pennsylvania—Missouri—and Wisconsin. It should be noted that the plaintiff in no way alleges wrong doing on the part of the Senator elects of these states but rather claims that an election result where the winner is a result of the poison fruit of illegal and criminal activity which violates a citizens right to a due process and equal protection as regards a free and fair election—where the defendants who caused the damage will receive substantial benefit from said illegal result—cannot be allowed to stand and justifies a new election.

V. Reliefs sought by claimant

1. Plaintiff is requesting an Emergency hearing in this case where the court can hear the merits of this complaint and decide on what an appropriate course of action would be. As will be clear from the relief sought, this Emergency hearing is required because certain reliefs would be rendered mute by the passage of time. The critical dates related to this case and the reliefs sought are: (a) December 19, 2016: The date the Presidential electors convene to cast their ballots; (b) January 6, 2017: the date the new congress is seated. During this first session of Congress is when The Joint session of the house and senate count the votes as cast by the elector and certifies the winner; (d) January 20, 2017, the date the President elect is inaugurated as President and takes the oath of office; (e) and Tuesday-- January 12th , 2017—the last date the defendant believes is feasible regarding a request that the Court thru an appropriate party investigate the claims alleged in the complaint and issue a preliminary finding to the Court and furnish the Court time to review the matter and act as it deems appropriate.

2. The Investigation:

A. The plaintiff ask the Court to request the Attorney General to investigate the information and beliefs in this complaint as regards illegal and unethical activities in the 2016 Election for President of the United States and—in the event the Justice Department refuses to do so— to appoint a special Counsel to conduct said investigation. Plaintiff further asked the Court that the investigation proceed on a time of the essence and report back to the court with its preliminary finding by no later than January 12, 2017; and further to advise the Court on a bi-weekly basis on the progress of the investigation and the likely date for a final finding date at the time of each report.

B. To further order a finding from competent experts on the likelihood that the “Comey Letter Avalanche of leak effect” effected the election results outlined herein as this complaint believes is almost certainly did and report to the Court on their best judgment on findings by January 12, 2017.

3. Senate Elections:

In line with the fact the fact that The U.S. Constitution provides that “each House shall be the judge of the elections, returns and qualifications of its own members,” as regards being duly elected and accepted, and the 1969 Federal Contested Elections Act—and the Senate’s Rules—at the time of the order under 2 A and 2B above—plaintiff ask the Court to forward a request to the Congress to take the following actions: (a) Pass legislation to amend the safe harbor provision to January 15th, 2017 till 8:00 AM and from six to five days ; request the Congress which convenes on January 6th to seat all elected entities except for the three Senators outlined herein who can be seated provisionally and await the Courts investigatory findings which may inform their future actions to take place on January 14th thru the 15th at 8:00 AM as regards their legislative Constitutional powers to seat their own members as regards contested elections —and by necessity await the action of the electors before on that same date acting on the Presidential

certification. It should be noted that as the Congress is the final adjudicator of who it seats and accepts that this is not a Court Order but a request which the Congress can deal with as it deems appropriate when meeting. This request however is made with the knowledge that an investigatory finding is pending which may justify for impeachment of the new President if in fact he is seated and public knowledge that the Congress seated three Senators who may well have been illegally elected rather than waiting for the results of the investigation and making a due process decision on how to proceed.

4. Investigatory Findings: If the review of the findings delivered on, January 12, 2017, justify such action:

(i) Make public and forward the investigatory findings and Court's review of same to the Congress along with a "request" for the Congress to take action it deems appropriate regarding the election of the three new Senators where the Congress may seat the newly elected Senators—overturn the election and seat the Senators that would have been elected—or vacate the seats and order new special elections for Senate in the States of Pennsylvania—Missouri—and Wisconsin—to take place with the results to be tabulated—certified by the States--and forwarded to the congress so that the 115th Congress seated on January 6th where those Senators elected and not subject to a new election can seat the Senators elected by the new election—the three Senators to be seated at an appropriate session in accordance with the new election results. (Plaintiff believes this is a just and fair remedy which is constitutional and allows for the efficient and continuing administration of government and further points out that the truly elected Senator is losing two months of their term to insure that the balance of the term is legitimate and legal).

ii. In line with its Constitutional duties request that the joint session of Congress now convened on Wednesday, January 14th thru to January 15th at 8:00 AM act as it deems appropriate regarding the acceptance of the Electors

votes and if the required electoral votes are not achieved—in line with the 12th Amendment to the Constitution concerning “A Contingent Election” elect the President and Vice President as outlined by the Constitution with the elected parties to be inaugurated on January 20, 2017.

5. Monetary Damages: Beyond any other reliefs, the plaintiff is asking the Court to impose very substantial monetary damages on the defendants—and any other parties who the investigation shows are complicit here. These damages should be a function of the offense: Illegally Turing the United States into a banana republic for partisan political power—and a function of the assets of each party and their degree of knowledge and complicity.

These damages are requested as follows: (1) one dollar in nominal damages vindicating plaintiff’s legal rights and (2) very substantial Punitive Damages as determined by the Court possibly related to a **highly** culpable state of mind which supports an amount dependent upon the defendant’s financial circumstance and culpability. These Punitive damages primarily to serve penal **and deterrent functions** will also perform a vindictory function which provides an incentive for an aggrieved citizen to act as a private attorney general, performing law enforcement or “bounty” function. An example of what the Plaintiff believes would be adequate damages for President elect Trump in effect turning the United States into a “Banana Republic” would be the orderly sale of all his assets with the monies to be divided as follows by the Court: (20% bounty to the Plaintiff and 80 % to the Federal Treasury to be utilized to pay down the federal debt). In the plaintiff’s mind—if the allegations contained in this complaint are true--it is imperative that the guilty be made to pay both with criminal penalties and with very substantial monetary damages. The carrying out of a coup against the Constitution and people of the United States is that serious.

Note to above sought reliefs and The Emergency Hearing: In order to achieve all the reliefs sought herein, an Emergency Hearing on a time of the essence basis is required. However, not all the relief sought under this complaint will be rendered mute by the short passage of time which will render other parts of the relief mute. More specifically, (1) The request for the Court to facilitate an appropriate investigation regarding this complaint and both the initial and final findings of this investigation survive and can importantly form the basis for further investigation by parties authorized to do so and possible subsequent criminal

penalties; likewise—the investigation can furnish evidence which may lead the Congress to begin Impeachment hearings—and also can form the basis for monetary damages the Court decides to award. (2) The monetary damage component of the relief will survive and by necessity will likely await the final official investigatory finding issued to the Court and the Court’s review of same. (3) The plaintiff is aware that it cannot bring a criminal action but believes that he has the right to make the court aware of such alleged criminal activity which forms a significant part of the civil action brought.

Standing: In doing research for this “pro se” action” the most perplexing issue is that of standing and the possibility that as the plaintiff has no interest in the case above every other citizens interest in public issues the Court may not grant plaintiff standing. This part of the law while possibly necessary to avoid the Courts being “ overwhelmed with cases where a citizen is questioning public policy or other matters” seems extremely faulty reasoning when it comes to a citizens constitutional rights when they are violated by alleged criminal activity. There will be citizens who will see this alleged criminal activity and have no problem with it whatsoever because the result in the near term as regards the victor and a whole host of outcomes is one they strongly want not wise or prudent enough to realize the maxim “ there but for the grace of God go I” when the “ shoe is on the other foot “ and victors and policy results contrary to their preferences are in place. It just seems incredible that in a case where the alleged actions violate the citizens constitutional rights and in fact lead to an government which was brought about by a illegal coup like action that endangers the very fabric of our Democracy and in fact the rule of law that a citizen who feels this strongly does not have the right to bring a case to an important and accessible venue that can address the matter. Moreover, in the damages listed, and repeated here for very important emphasize, I state I am a Moslem and as such for reasons of persecution of religious liberties have “A special stake in insuring that Mr. Trump is not allowed to assume office thru illegal means.” Less the Court be misled here—like many Albanians—I am white with a European surname-- and not practicing or religious or easily identifiable as a Moslem, and therefore do not face the problems that religious easily identifiable Moslems do—but as a Moslem who may wake up tomorrow having found my religion so to speak with every right to do so and with every right to practice my religion without interference or intolerance from the State—and as one who has great sympathy for fellow Moslems who face religious intolerance—persecution—and violence—who believes that Trump is a bigot of the highest order—I would urge the Court to grant me standing to protect my religious liberty and hear this case.

VI. Certification and Closing

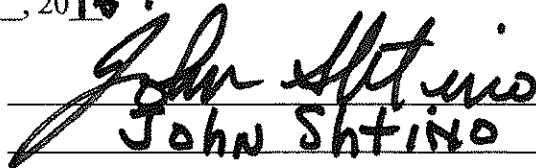
Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a non frivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

- A. I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Dec. 6, 2016.

Signature of Plaintiff

Printed Name of Plaintiff



John Shtino